

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

Metro Chamber of Commerce

Richard Ruel

Rashee Ali

Ulice Jordan

Plaintiff

v.

First Illinois Bancorp, Inc. D/B/A Lindell Bank

BKD Advisors

M. Leon Hall

Defendant(s)

Case Number:

22-cv-228-DWD
(Clerk's Office will provide)

PRO SE CIVIL RIGHTS COMPLAINT

(Non-Prisoner)

I. JURISDICTION

Subject matter jurisdiction is invoked under 28 U.S.C. § 1331, 28 U.S.C. § 1343(a)(3), and/or 42 U.S.C. § 1983. List any additional bases for federal subject matter jurisdiction here:

At all times material to this complaint, Plaintiff was a resident of the Southern District of Illinois. Defendant M. Leon Hall/First Illinois Bancorp, Inc./Lindell Bank and its Advisor BKD Advisors whos headquarters being located at 327 Missouri Ave. East St. Louis, IL. opeating in the Southern District of Illinois.

II. PARTIES

Plaintiff:

A. Plaintiff, a citizen of Illinois (state), who resides at 1401 Bowman Street Apt C, East St. Louis, IL. 62205, alleges that his/her civil rights were violated by the individual(s) named below.

Defendant #1:

B. Defendant M. Leon Hall is employed as
(a) (Name of First Defendant)
First Illinois Bancorp, Inc D/B/A Lindell Bank- Owner
(b) (Position/Title)

with First Illinois Bancorp, Inc. 327 Missouri Ave. East St. Louis, IL.

(c) (Employer's Name and Address)

BKD Advisors

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government? ☐ Yes ☒ No

If your answer is YES, briefly explain:

Check one of the following:



This defendant **personally participated** in causing my injury, and I want **money damages**.



The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Defendant #2:

C. Defendant _____ is employed as

(Name of Second Defendant)

(Position/Title)

with _____

(Employer's Name and Address)

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☐ Yes ☐ No

If you answer is YES, briefly explain:

Check one of the following:



This defendant **personally participated** in causing my injury, and I want **money damages**.



The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Defendant #3:

D. Defendant _____ is employed as
(Name of Third Defendant)

(Position/Title)

with _____
(Employer's Name and Address)

At the time the claim(s) alleged in this complaint arose, was Defendant #3 employed by the state, local, or federal government? ☐ Yes ☐ No

If you answer is YES, briefly explain:

Check one of the following:

☐ This defendant **personally participated** in causing my injury, and I want **money damages**.

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Additional Defendant(s) (if any):

E. Using the outline set forth above, identify any additional Defendant(s), using additional pages, if necessary.

III. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in this federal court?

☐ Yes ☒ No

B. If your answer to “A” is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline.

1. Parties to previous lawsuits:

Plaintiff(s):

Defendant(s):

2. Case number:

3. Name of Judge to whom case was assigned:

4. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?):

IV. STATEMENT OF CLAIM

State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments or citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege several related claims, number and set forth each claim in a separate paragraph.

Plaintiff alleges that the Defendant M. Leon Hall and his company First Illinois Bancorp, Inc., and its affiliates practice open and blatant discrimination towards myself and the other residence of LMI in the application, approval and disbursement of loans, grants and equity investments from the First Illinois Bancorp, Inc./Lindell Bank. Violating Civil Rights Act of 1964 Title VII. And CRA Regulations G;BB of Sec 201-202; 203-204.

2). Plaintiff alleges that his company was denied a request for bank participation on three occasions by M. Leon Hall/Owner and senior loan officer. The first 8/2014 for \$1.5 Million, second 7/2019 again for \$1.5 Million and a third request 1/14/2022. Plaintiff asserts that in each event the Defendant did not give serious consideration but rather prejudged the application as (DOA) Denied On Arrival.

3). Plaintiff alleges the Defendant failed (Breached) to meet its Fiduciary responsibilities to its most valued depositor the City of East St. Louis and its residents. Which has left a disproportionate amount of uncatalized community development projects.

4). Plaintiff alleges that Defendant failed to meet even the minimum Community Development needs standards pursuant to ss.25.08 if the final rule 2020 Qualifying Activities in a CRA Desert like East St. Louis, IL. That could also qualify for multiplier base on Office of Comptroller (OCC) determination of the activity's responsiveness, innovativeness, or complexity.

5). Plaintiff alleges Defendant has failed to meet OCC Public Welfare Investment threshold of up to 15% of capital and surplus. Plaintiff alleges that a public private partnership was proposed to Defendant on 1/14/22 to help meet the minimum Community Development Investments by partnering with the City of East St. Louis's RITE Plan Initiatives Sponsored by Metro Chamber of Commerce a CDE(Community Development Entity).

V. REQUEST FOR RELIEF (*check as many boxes as appropriate*)

Plaintiff requests that the court grant the following relief:

Compensatory damages in the amount of \$ 1,200,000,000.

Punitive damages in the amount of \$ 120,000,000.

An ordering requiring defendant(s) to:

Fulfilment of CRA Regulations enforcement and to comply with OCC threshold of 15% of capital and surplus for future projects in the LMI of East St. Louis, IL.

Pay Disgorgement award and other equitable remedies from a 10yr Look Back.

A money award to Plaintiff cost and disbursements associated with bringing this action.

A declaration that:

WHEREFORE, Plaintiff request the relief mentioned of \$1.2 Billion Dollars that represent a 10yrs look back that cause that contributed to the economic decline of East St. Louis while its bank partner uses the goodwill of the residents of East St. Louis to lend, approve and invest communities immediately surrounding (a virtual RED LINE).

Other:

Plaintiff alleges the violation of Civil Rights Act of 1964 Title VII
Discrimination/Redlining/ CRA Regulation G: BB; Sec 201-202; 203-204.

VI. JURY DEMAND (*check one box below*)

Plaintiff ☒ does or ☐ does not request a trial by jury.


DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 2/8/22
(date)

1401 Bowman Street Apt. C
Street Address

East St. Louis, IL.62205
City, State, Zip


Signature of Plaintiff
Richard Ruel
Printed Name